

Cahoy Dec.

Ex. 19

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UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

REBOTIX REPAIR LLC,

Plaintiff,

- VS -

INTUITIVE SURGICAL, INC.,

Defendant.

/

HIGHLY CONFIDENTIAL

VIDEOTAPED

DEPOSITION OF: CHRIS GIBSON

DATE TAKEN:

TUESDAY, JUNE 22, 2021

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1.6 - 2.4 = 0.8 5 - 1.5 = 3.5

CARMEN THOMAS, REGISTERED
PROFESSIONAL REPORTER AND
NOTARY PUBLIC

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1 Q -- safely?

2 MR. ERWIG: Sorry.

3 Object to the form and lacks foundation.

4 THE WITNESS: I don't know.

5 BY MS. LENT:

6 Q Did you ever tell any customers how many
7 times they could expect to be able to reset the usage
8 counter on an EndoWrist?

9 A I think we told them exactly what I said,
10 that we can reset the counter an unlimited number of
11 times, but not all EndoWrists will be available for the
12 repair process because some of them will be so badly
13 damaged or something else is wrong with them where they
14 will not be a candidate for the repair service.

15 Q Did you have a rule of thumb that you used
16 for the number of times you expected a particular
17 EndoWrist to be able to be reset?

18 MR. ERWIG: Objection to form.

19 THE WITNESS: No, I don't believe so.

20 Because that is typically related to how the
21 surgeon uses the different instruments in
22 procedures.

23 BY MS. LENT:

24 Q Do you know whether any customer sent the
25 same EndoWrist to Rebotix Repairs more than once to have

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1 CERTIFICATE OF OATH
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4 I, Carmen J. Thomas, Registered Professional
5 Reporter, Notary Public, State of Florida, certify that
6 witness, CHRIS GIBSON, appeared via videoconference on
7 the 22nd day of June, 2021 and was duly sworn.

8 WITNESS my hand and official seal this 23rd day of
9 June, 2021.

10
11 *Carmen J. Thomas*
12

13 Carmen J. Thomas,
14 Registered Professional Reporter
15 Notary Public, State of Florida
16 MY COMMISSION #GG 125902
17 EXPIRES November 16, 2021
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